

**From:** [HarborComments](#)  
**To:** [PortlandHarbor](#)  
**Subject:** Comments on Portland Harbor Explanation of Significant Differences  
**Date:** Wednesday, November 28, 2018 8:33:29 PM

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**From:** (b) (6)  
**Sent:** Monday, November 26, 2018 10:49 AM  
**To:** HarborComments <HarborComments@epa.gov>  
**Subject:** Comments on Portland Harbor Explanation of Significant Differences

As a Portland resident, river swimmer, and as someone who recognizes that Portland's most vulnerable communities often shoulder the heaviest burden of exposure to pollutants, I strongly object to the proposed changes, or Explanation of Significant Differences, that would reduce the level of cleanup required for benzopyrene.

The level of uncertainty around the assumptions made to justify lower cleanup standards is not acceptable. Though some studies have shown that benzopyrene may be less toxic than originally thought, other research calls this into question, and importantly, no research has examined the toxicity of benzopyrene in combination with other chemicals at the Portland Harbor site, including PAHs, PCBs, dioxins, organic chemicals, and metals.

It would be irresponsible to reduce cleanup standards at the Portland Harbor at this time, especially as the EPA has not yet determined whether the work done under these proposed changes would uphold water quality standards to protect people, animals, and the environment from dangerous risks.

Thank you,

(b) (6)

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